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 CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

CITY AND COUNTY OF SAN FRANCISCO,

Plaintiff,

v.

CITY OF OAKLAND AND PORT OF
 OAKLAND,

Defendants.

AND RELATED COUNTERCLAIM

Case No. 3:24-CV-02311-TSH

**SECOND DECLARATION OF MELISSA
 ANDRETTA IN SUPPORT OF THE CITY'S
 MOTION FOR PRELIMINARY INJUNCTION**

1 I, Melissa Tytko Andretta, declare as follows:

2 1. I am the Director of Aviation Marketing & Development at San Francisco
3 International Airport ("SFO"). I submit this declaration in connection with the City and County of
4 San Francisco's Reply Brief In Support Of Plaintiff City And County Of San Francisco's Motion
5 For Preliminary Injunction Enjoining Defendants. I declare that the following is true to the best of
6 my knowledge, information, and belief, and that if called upon to testify, I could and would testify
7 to the following.

8 2. I have extensive background in marketing within the aviation industry as Director
9 of Aviation Marketing & Development at SFO and having worked in various marketing roles for
10 Icelandair for over 12 years. One of my primarily responsibilities at SFO is international marketing
11 of the airport, which we commit approximately \$1.4 million to annually. In addition, while at
12 Icelandair I was in charge of all marketing for the Americas and the UK & Ireland.

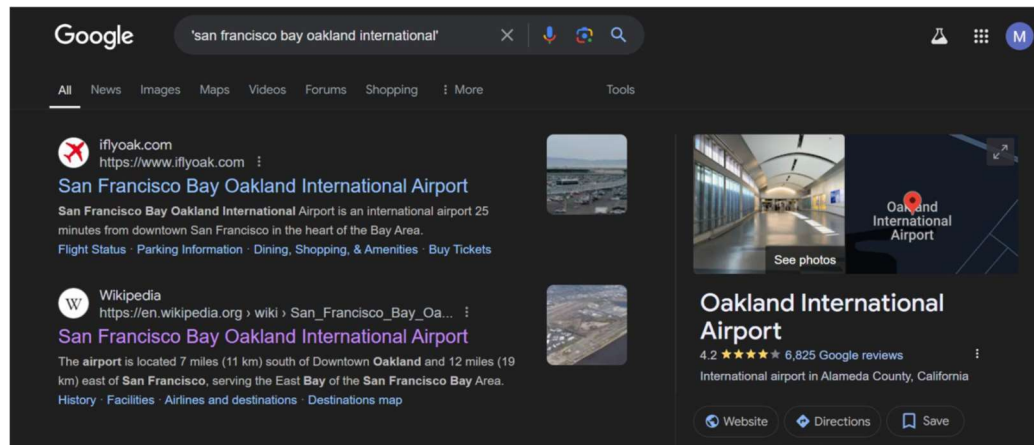
13 3. I have reviewed the Port of Oakland's (the "Port" or "Oakland") Opposition to
14 Plaintiff's Motion for Preliminary Injunction (the "Opposition") and supporting declarations.

15 4. I was not surprised to see that declarations were submitted from individuals working
16 for Southwest Airlines and Spirit Airlines. Southwest Airlines and Spirit Airlines account for
17 roughly 89% of seat capacity for flights in and out of the Oakland airport and have a close
18 relationship with the airport.

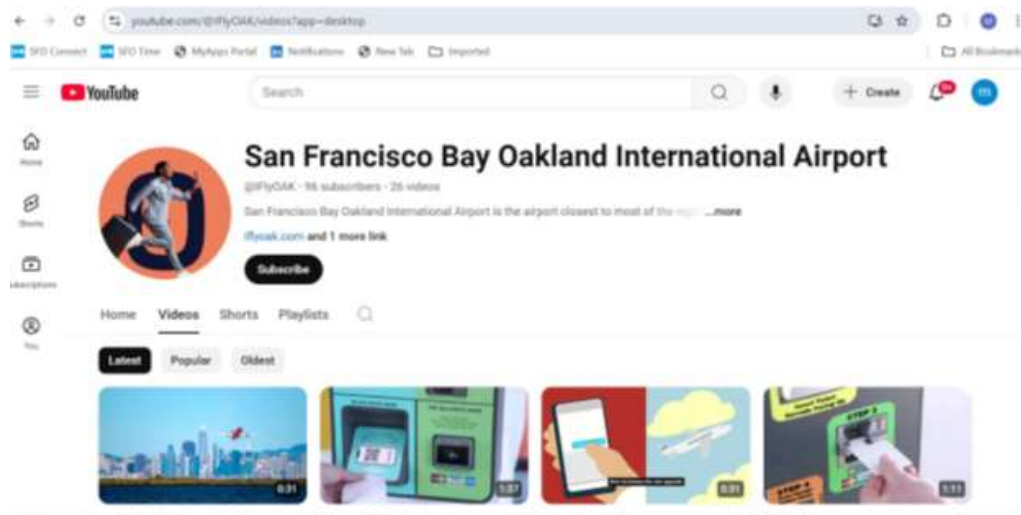
19 5. Several of the declarations submitted in support of the Opposition discuss that it is
20 industry practice for IATA codes to be displayed with airport names on websites for OT As, airlines,
21 and ticketing aggregators. Based on my experience, however, these are far from the only contexts in
22 which travelers encounter airport names. I identified several in my prior declaration, but there are
23 many others, all of which inform travelers' understanding of airport names and identities.

24 6. For example, a Google search for "San Francisco Bay Oakland International airport"
25 returns results for the airport's website and Wikipedia page, neither of which display the OAK
26 IATA code. The following is a true and correct screenshot of such a Google search.

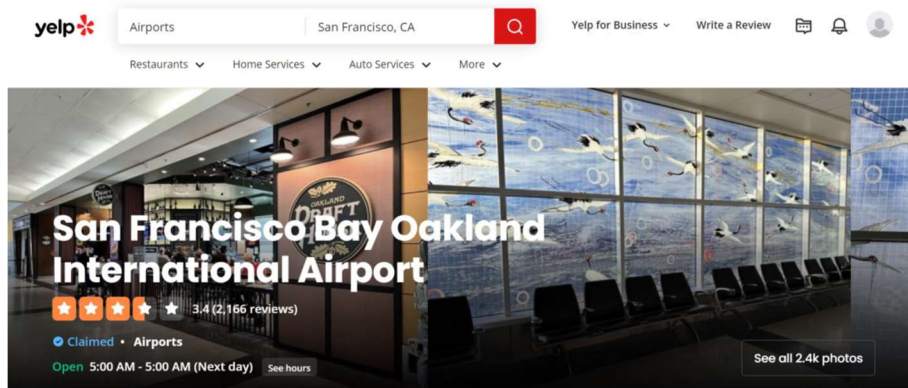
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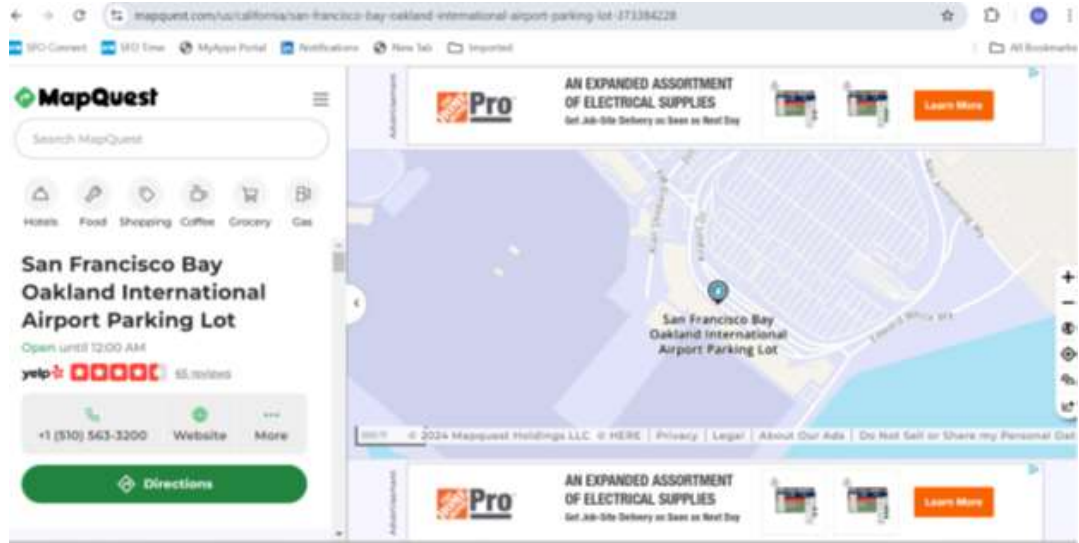
7. The Port's YouTube page for its airport also now displays the new name, and without an IATA code. The following is a true and correct screenshot of the Port's YouTube page.



8. The Port's Yelp page for its airport also now displays the SAN FRANCISCO BAY OAKLAND INTERNATIONAL AIRPORT trademark, and without an IATA code. The following is a true and correct screenshot of the Port's Yelp page for the Oakland airport.



9. I also conducted a search for the SAN FRANCISCO BAY OAKLAND INTERNATIONAL AIRPORT on Mapquest, a popular navigation website. The airport's name is again displayed without an IATA code. The following is a true and correct screenshot of a reference to the Oakland airport on the Mapquest website.



10. As an iPhone user, I regularly use Apple Maps, and recently noticed that searches for the Oakland airport return references to the SAN FRANCISCO BAY OAKLAND INTERNATIONAL AIRPORT without displaying the airport's IATA code. The following is a true and correct screenshot of a reference to the Oakland airport on Apple Maps.



1 11. I recently learned of yet another incident in which the SAN FRANCISCO BAY
2 OAKLAND INTERNATIONAL AIRPORT trademark resulted in confusion. On October 6, 2024,
3 I attended the Routes World Conference in Bharain. This is the world's largest conference for
4 airport aviation development teams to meet with airline network planning teams from around the
5 world. While there, I spoke to a network planner from Icelandair, who informed me that she was
6 looking forward to meeting with SFO on October 8, 2024. We have met with Icelandair many
7 times and expect them to make a return to California in 2029 when they have the aircraft to do
8 so. However, we hadn't requested a meeting with them for this Routes World. When I shared with
9 her that SFO had not requested a meeting with her airline, she looked up her meeting schedule and
10 realized that she had accepted a meeting with the "San Francisco Bay Oakland International
11 Airport" thinking she was scheduling a meeting with SFO. This individual is a sophisticated airline
12 professional whose job it is to know the industry, and yet even she was confused by the Oakland
13 airport's new name.

14
15 Executed on this 22th day of October, 2024 at San Francisco, California.

16
17 
18 _____
19 Melissa Andretta